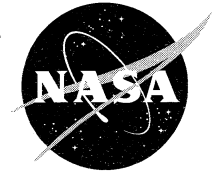


National Aeronautics and  
Space Administration  
**Lyndon B. Johnson Space Center**  
2101 NASA Road 1  
Houston, Texas 77058-3696



December 6, 2006

Reply to Attn of:

AL-06-169

TO: AA/Director

FROM: AL/Chief Counsel

SUBJECT: Approval for JSC Employees with Senior Institutional or Project Responsibilities to Attend a Pre-Launch Reception Co-Sponsored by NASA Marshall Space Flight Center, ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne

In accordance with 5 C.F.R. § 2635.204(g)(2) and (3), I make the following determination:

You have been invited to attend a pre-launch reception co-sponsored by NASA Marshall Space Flight Center (MSFC), ATK Launch Systems, Lockheed Martin Michoud Space Systems, and Pratt-Whitney Rocketdyne, at the Doubletree Hotel in Cocoa Beach, Florida, at 6 p.m. This event is to be held in conjunction with the launch of STS-121, at the Kennedy Space Center.

This event is a widely-attended gathering of NASA and other Federal officials, state officials, and representatives from the aerospace industries. The reception is valued at \$20 per person and approximately 150 individuals are expected to attend. The food and beverage costs of the reception are being provided by the industry co-sponsors with support from NASA MSFC in managing the event. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635(g)(2).

You presently have or in the near future will have duties that may substantially affect the interests of the industry co-sponsor, your senior institutional or project responsibilities could significantly influence current or future contractual matters with the co-sponsors relating to NASA.

I have determined that free attendance of these senior institutional and project leaders at this pre-launch reception is in the interests of the Agency because it will allow you to discuss NASA missions, such as STS-116, programs, and operations with other

attendees. This event is co-sponsored by NASA MSFC and your attendance at the event will help to raise NASA's profile with national, state, and local business and governmental leaders, will contribute to community relations, and will support NASA's statutory mandate to disseminate information concerning its activities.

Given the purpose of the event, the alignment of the event's interests with NASA's, the broad attendance anticipated, and the modest market value of the event, I have determined that the value to the Agency in having you attend this event outweighs any concern that free attendance may or may appear to improperly influence you in the performance of your duties.

Accordingly, you may accept free attendance at this pre-launch reception. You may also accept the invitation for your accompanying spouse or guests.

Questions about this determination may be addressed to Nadalynn Jenkins at 281-483-1004.

*for Maryh. / Brerman*  
Bernard J. Roan  
Chief Counsel